

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 21-475 (PAD)

RADAMES BENITEZ-CARDONA

Defendant

MOTION TO MODIFY CONDITIONS OF RELEASE

TO THE HONORABLE COURT:

Comes now, RADAMES BENITEZ-CARDONA, through his undersigned Counsel, and to this Honorable Court very respectfully submits the following:

1. Defendant is currently out on bail and has complied with all conditions imposed by this Honorable Court.
2. We request that the Court authorize defendant to move to a rented apartment at the following address: Cooperativa de Vivienda Jardines de Trujillo Alto, Edificio F, Apartment 302, Trujillo Alto, PR 00976. The U.S. Probation office has been advised of this request to move.
3. Defendant moves to modify the conditions imposed and allow him to move to the apartment he has rented with his family.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this the 23rd day of March , 2022.

S/ MICHAEL S. CORONA-MUÑOZ
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date, March 23, 2022, a true and correct copy of this motion was provided via electronic mailing through the CM/ECF system to Scott Anderson, AUSA at his known electronic address at the United States Attorneys' Office.

S/ MICHAEL S. CORONA -MUÑOZ